



# CITY OF PORTLAND ENVIRONMENTAL SERVICES



1120 SW Fifth Avenue, Room 1000, Portland, Oregon 97204-1912 ■ Sam Adams, Commissioner ■ Dean Marriott, Director

May 27, 2008

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**Environmental  
Cleanup Office**

Mr. Eric Blischke and Mr. Chip Humphrey  
EPA, Region 10, Oregon Operations Office  
805 SW Broadway, Suite 500  
Portland, OR 97205

Dear Eric and Chip:

On May 22, 2008, the Lower Willamette Group (LWG) sent the U. S. Environmental Protection Agency (EPA) a letter commenting on several outstanding issues that have arisen in the EPA-directed analytical work for the Portland Harbor Superfund Remedial Investigation and Feasibility Study. The City is a member of the LWG and is funding a substantial portion of the comprehensive assessment of contamination and potential remedies for the Harbor cleanup. We are writing to express the City of Portland's separate views on the issues raised in the LWG correspondence, since the positions expressed in the LWG letter do not necessarily represent the views of the City.

The issues raised by LWG include: the analysis of a drinking water scenario in the Portland Harbor human health risk assessment; the potential use of existing Ambient Water Quality Criteria in setting cleanup remedial goals; and the analysis of clam consumption in the human health risk assessment. These issues, which affect future public drinking water sources and public consumption from the river, raise policy issues that are unique to the City.

In each case, the City is aware of concerns that conducting these analyses could lead to what are perceived to be impractical or otherwise inappropriate cleanup decisions. Nonetheless, the City shares the EPA view that the individual analyses should be conducted. In fact, it appears to us that the analyses will actually shed important light on the essential and difficult risk management choices that will be needed in selecting the type and ultimate scope of cleanup remedies for the Harbor.

The City believes there will be important discussions about the practical implications and effects of each of these analyses and that the evaluations are needed to inform the difficult decisions that will be made in the future. Accordingly, the City wants to be sure that these discussions occur in a timely manner and are based on a careful consideration of the analyses once they are completed and publicly available. The City will participate fully in the consideration of each of these issues at that time, and reserves its ability to pursue formal or informal dispute resolution if it should become necessary.

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The LWG letter also discusses the agreed-upon expansion of the study area boundary and the importance of early source control in that area just upriver of the previous study area. The City supports the work being undertaken to evaluate contamination in that area. In addition, the City has been working closely for several years with the Oregon Department of Environmental Quality (DEQ) in an extensive effort to accelerate source control for uplands affecting Portland Harbor. Recently, the City has initiated with DEQ and other partners an important and substantial sediment sampling effort in the reach between the Steel Bridge and Ross Island to facilitate the identification and resolution of source control concerns there. We are pursuing these collaborative efforts to help assure that source control can be addressed effectively prior to the initiation of the Harbor sediment remedy.

Thank you for the opportunity to offer our views and we look forward to working with you on these important matters.

Sincerely,



Rick Applegate  
Superfund Administrator  
Portland Harbor

cc:

Dan Opalski, EPA  
Kristine Koch, EPA  
Dick Pedersen, DEQ  
Keith Johnson, DEQ  
Jim Anderson, DEQ  
Rick Kepler, ODFW  
Ted Buerger, USFW  
Rob Neely, NOAA  
Preston Sleeper, DOI  
Brian Cunningham, Confederated Tribes of the Warm Springs  
Rose Longoria, Confederated Tribes of the Yakama Nation  
Paul Ward, Confederated Tribes of the Yakama Nation  
Mike Karnosh, Confederated Tribes of the Grand Ronde  
Tom Downey, Confederated Tribes of the Siletz

Lisa Bluelake, Confederated Tribes of the Grand Ronde  
Billy Barquin, Confederated Tribes of the Siletz  
Audie Huber, Confederated Tribes of the Umatilla  
Erin Madden, Nez Perce Tribe  
Portland Harbor Community Advisory Group  
Lower Willamette Group  
Dean Marriott, BES  
Austin Raglione, Office of Mayor Tom Potter  
Tom Miller, Office of Commissioner Sam Adams  
Brendan Finn, Office of Commissioner Dan Saltzman  
Ty Kovatch, Office of Commissioner Randy Leonard